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PATENAUDE, MICHAEL D. KAHN and
8 *ANGIE HONG HOAR*

9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 TROY CAPITAL, LLC, a Nevada Limited
13 Liability Company,

14 Plaintiff,

15 vs.

16 PATENAUDE & FELIX APC, *et al.*,

17 Defendants.

18 PATENAUDE & FELIX APC,

19 Counterclaimant/Third-Party
20 Plaintiff

21 vs.

22 TROY CAPITAL, LLC, a Nevada Limited
23 Liability Company; RANCE WILLEY, an
Individual, and TROY DUPUIS, an
24 Individual,

25 Counter-defendant/Third-
26 Party Defendants

Case No. 2:20-cv-00205-JCM-DJA

**STIPULATION TO ESTABLISH
BRIEFING SCHEDULING FOR
MOTIONS FOR PARTIAL SUMMARY
JUDGMENT**

(First Request)

1 IT IS STIPULATED by all parties, through their respective counsel, and pursuant to LR
2 IA 6-1 and LR 7-1, that the briefing relating to Plaintiff's Motion for Partial Summary Judgment
3 (ECF No. 92, the "Motion"), filed on November 8, 2021, proceed on the following schedule:

4 1. The current deadline for Defendants to respond to the Motion is November 29, 2021,
5 which is the Monday following Thanksgiving. The parties agree to extend this deadline by two
6 weeks to accommodate family obligations of the parties, counsel and witnesses over the holidays.
7 Additionally, undersigned defense counsel is dealing with an unexpected family health issue, which
8 requires out-of-town travel this week, and possibly additional time in December as well.

9 2. The parties also anticipate that Defendants will be filing a counter-motion for
10 summary judgment relating to the subject matter of Plaintiff's Motion (i.e., the Attorney
11 Agreement). The parties similarly agree to extend Plaintiff's response deadline to accommodate
12 family obligations of the parties, counsel and witnesses over the holidays.

13 3. Accordingly, the parties' agree on the following briefing schedule for the Motion and
14 anticipated counter-motion:

15 **December 13, 2021** – deadline for Defendants' response to Motion and
16 the filing of Defendants' counter-motion

17 **January 10, 2022** – deadline for Plaintiff's reply in support of Motion

18 **January 17, 2022** – deadline for Plaintiff's response to Defendants' counter-
19 motion

20 **February 14, 2022** – deadline for Defendants' reply in support of counter-motion
21

22 4. This stipulation is made in good faith and for good cause, and not for any purpose to
23 delay.
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5. The parties further agree that this stipulated extension of time does not operate as any admission or waiver of any claim, defense or issue.

DATED this 24th day of November, 2021

LEWIS BRISBOIS BISGAARD &
SMITH LLP

/s/ Jeffrey D. Olster

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PATENAUDE, MICHAEL D. KAHN and
ANGIE HONG HOAR

DATED this 24th day of November, 2021

RELIEF LAWYERS, LLC

/s/ Dale K. Kleven

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TROY CAPITAL, LLC and Third-Party
Defendants RANCE WILLEY and TROY
DUPUIS

DATED this 24th day of November, 2021

SANTORO WHITMIRE

/s/ Jason D. Smith

Nicholas J. Santoro
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Attorneys for
Counterclaimant/Third-Party Plaintiff
PATENAUDE & FELIX APC

DATED this 24th day of November, 2021

SIMMONDS & NARITA LLP

/s/ Tomio B. Narita

Tomio B. Narita
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TROY CAPITAL, LLC and Third-Party
Defendants RANCE WILLEY and TROY
DUPUIS

1 DATED this 24th day of November, 2021.

2 PATENAUDE & FELIX, APC

3 /s/ Joseph DiNoia

4 Joseph DiNoia

5 Nevada Bar No. 11951

6 7271 West Charleston Boulevard, Suite 100

7 Las Vegas, Nevada 89117

8 *Attorneys for*

9 *Counterclaimant/Third-Party Plaintiff*

10 *PATENAUDE & FELIX, A.P.C.*

11 ORDER

12 IT IS SO ORDERED:

13 

14 UNITED STATES DISTRICT JUDGE

15 DATED: November 29, 2021

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 24th day of November, 2021, service of the foregoing
**STIPULATION TO ESTABLISH BRIEFING SCHEDULING FOR MOTIONS FOR
 PARTIAL SUMMARY JUDGMENT (First Request)** was made upon each party in the case
 who is registered as an electronic case filing user with the Clerk, pursuant to Fed. Rule Civ. P.
 5(b)(3), and Local Rule 5-4, as follows:

<i>Attorney</i>	<i>Party</i>	<i>Phone/Fax</i>
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By /s/ Susan Awe
 An Employee of
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